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Melanie Bachman, Staff Attorney
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 0605

December 13th, 2011

RE: CSC Proposed Amended Regulations

Dear Ms. Bachman:

I respectfully rise to comment upon the Connecticut Siting Council's proposed regulation changes.

As one who recently appeared as Party in a Telecommunications Proceeding, I address you with some knowledge and understanding of the impact these proposed regulations changes could have on citizens' participation and perhaps the council's deliberations.

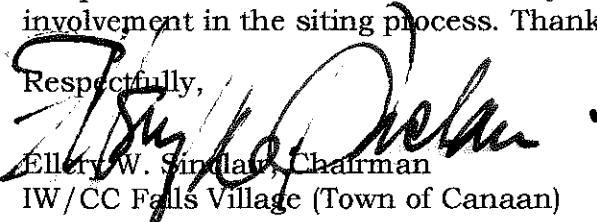
Among the CSC responsibilities is balancing the need for adequate and reliable public utility service with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values. I respectfully suggest it is incumbent upon the Siting Council to encourage, not discourage, greater public participation, specifically with regard to environmental and ecological concerns and impacts as well as the other aforementioned values—as the applicant substantially establishes the apparent public need while minimizing those issues incompatible with the applicant's perceived need. The proposed change to 16-50j-15b would apparently impose undue burdens of both cost and time especially upon non-profit organizations, which are appropriately informed on precisely the issues about which the Siting Council needs a balance of information.

Furthermore, regarding the use of the DEEP Natural Diversity Database maps, applicants (in our experience) distort the intention of the document—which is to indicate the likelihood of endangered, threatened and listed species, not to establish that there are no-such species in a locale. The use of this resource needs to be carefully and accurately used with scientific intention, not codified in a process of non-scientific misrepresentation.

Finally, the proposed exemption of tower-sharing from the public process is contrary to public interest. Tower-sharing is laudable in its striving to minimize the proliferation of towers and tower sites; however, removing from public purview potential issues of tower extension and creation of tower farms is clearly a matter of intense public interest when a single tower of a specific height has been approved through the public process.

I request that the CSC reconsider any regulation changes that encumber citizens' active involvement in the siting process. Thank you.

Respectfully,


Ellery W. Sinclair, Chairman
IW/CC Falls Village (Town of Canaan)